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May 9, 2005

BY HAND DELIVERY

Marlene H. Dortch, Secretary
Federal Communications Commission
236 Massachusetts Avenue, NE
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Washington, DC 20002

DOCKET FILE

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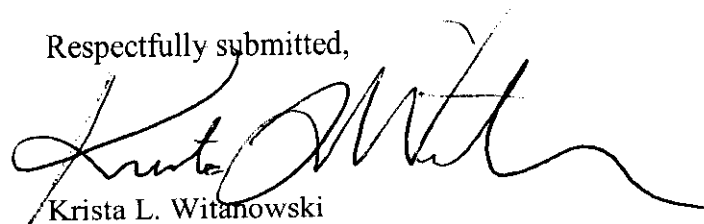
Federal Communications Commission
Office of Secretary

**Re: MCC Radio, LLC Comments
In the Matter of Amendment of Section 73.202(b) Table of
Allotments, FM Broadcast Stations (Abilene and Burlingame,
Kansas), MB Docket No. 05-133, RM-11206**

Dear Ms. Dortch:

In accordance with the provisions of 47 C.F.R. Section 1.420, enclosed please find an original and four copies of MCC Radio, LLC's comments in the above-referenced reallocation proceeding. If there are any questions concerning this matter, please contact the undersigned.

Respectfully submitted,



Krista L. Witanowski

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Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of)
Amendment of Section 73.202(b),) MB Docket No. 05-133
Table of Allotments,) RM - 11206
FM Broadcast Stations)
(Abilene and Burlingame, Kansas))

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To: Office of the Secretary
Attn: Chief, Audio Division, Media Bureau

Federal Communications Commission
Office of Secretary

COMMENTS

MCC Radio, LLC ("MCC"), licensee of Station KSAJ-FM, Channel 253C1, 98.5 MHz, Abilene, Kansas, and Petitioner in the above-captioned rulemaking proceeding, by its counsel, hereby submits its comments in response to the *Notice of Proposed Rule Making* ("NPRM") released on March 23, 2005 in the above-captioned proceeding,¹ in which the Commission proposes to amend the FM Table of Allotments, Section 73.202(b) of the Commission's Rules, to delete Channel 253C1 at Abilene, Kansas, and add Channel 253C1 at Burlingame, Kansas, as that community's first local service, and to modify the license of Station KSAJ-FM to specify operation on Channel 253C1 at Burlingame, Kansas.

MCC hereby incorporates by reference its Petition for Rulemaking in this matter, which was filed on October 4, 2004.² As shown therein, and as recognized by the Commission in the *NPRM*, the proposed Channel 253C1 allotment at Burlingame would provide a first local service,

¹ *In the Matter of Amendment of Section 73.202(b) Table of Allotments, FM Broadcast Stations, (Abilene and Burlingame, Kansas, MB Docket No. 05-133 (released March 23, 2005).*

² See Petition for Rulemaking, submitted in MM Docket No. 05-133 (filed on October 4, 2004).

whereas the retention of Station KSAJ-FM at Abilene would represent a second local service. Accordingly, the reallocation proposal results in a preferential arrangement of allotments based on priority (3) of the FM Allotment Priorities, first local service. In addition, the reallocation would provide an additional aural service to 393,661 individuals, resulting in a net gain of 228,266 persons, with no white or gray areas being created. Further, MCC has submitted a *Tuck* showing demonstrating that Burlingame is not dependent upon the Topeka Urbanized Area and therefore warrants a first local presence. MCC hereby restates its intention to apply for authorization to operate on the channel if it is reallocated and, if authorized, to build the station promptly.

WHEREFORE, in light of the foregoing, MCC respectfully requests that the FM Table of Allotments be amended to reallocate Channel 253C1 to Burlingame, Kansas, as the community's first local service. MCC further requests that the Commission modify the license for KSAJ-FM to specify Burlingame, Kansas as the station's community of license. Upon receipt of Commission authorization, MCC will promptly undertake to build the modified facilities for KSAJ-FM and commence operation of the station at Burlingame.

Respectfully submitted,

MCC RADIO, LLC

By: 

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May 9, 2005